

1 Carly Roman (CA Bar. No. 349895)  
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5 (Additional Counsel Listed on Signature Page)  
6

7 **UNITED STATES DISTRICT COURT**  
8 **CENTRAL DISTRICT OF CALIFORNIA**

9 WYATT BULS, individually and on  
behalf of all others similarly situated,

10 Plaintiff,

11 v.

12 DHTLA MOTORS, LLC d/b/a  
13 HYUNDAI OF DOWNTOWN LA,

14 Defendant.

15 Case No. 2:25-cv-03128

16  
17 **DECLARATION OF CARLY**  
18 **ROMAN IN RESPONSE TO RULE**  
19 **TO SHOW CAUSE RE**  
20 **SANCTIONS**

1 **DECLARATION OF CARLY ROMAN IN RESPONSE TO ORDER TO**  
2 **SHOW CAUSE RE SANCTIONS**

3 I, Carly Roman, declare as follows:

4 1. I am an associate attorney at Strauss Borrelli PLLC and counsel of  
5 record for Plaintiff in this matter. I submit this declaration in response to the Court's  
6 June 12, 2025 Order to Show Cause re Sanctions. [ECF 22].

7 2. **Persons Responsible for Preparing, Reviewing, and Ensuring**  
8 **Accuracy and Compliance.** Cassandra P. Miller, a Partner at Strauss Borrelli  
9 PLLC (admitted *pro hac vice*) was primarily responsible for preparing the initial  
10 draft of the Joint Rule 26(f) Report and the Schedule of Pretrial and Trial Dates.  
11 Both Ms. Miller and Anthony Paronich, the Principal of Paronich Law, P.C., were  
12 involved in reviewing and revising the drafts of the report and schedule to ensure  
13 compliance with the Court's Order Setting Scheduling Conference as they were  
14 exchanged with defense counsel.

15 3. **Persons Responsible for Meeting with Opposing Counsel:** Mr.  
16 Paronich conducted the Rule 26(f) conference with defense counsel and served as  
17 the primary point of contact for that discussion. Ms. Miller and I were also involved  
18 in follow-up correspondence with defense counsel regarding the drafting and  
19 finalization of the report. All communications with opposing counsel were  
20 professional and cooperative, and the Parties worked in good faith to reach  
21 agreement on proposed language and dates.

22 4. **Why the Report Failed to Comply with the Court's Order.**  
23 Unfortunately, during the course of exchanging and revising drafts, certain

1 proposed dates were inadvertently modified in ways that resulted in noncompliance  
2 with the Court's timing and calendaring requirements. For example, the trial date  
3 was mistakenly changed from April 6, 2027 (a Tuesday) to April 6, 2026 (a  
4 Monday), which caused corresponding adjustments in other deadlines that  
5 ultimately resulted in dates falling on incorrect days or outside of the required  
6 schedule.

7 5. Ms. Miller had reviewed a prior version of the Schedule that was  
8 compliant and mistakenly believed the dates in the revised draft remained  
9 consistent. These changes were made inadvertently during the revision process and  
10 were not caught prior to filing.

11 6. Additionally, the original report inadvertently omitted required  
12 specific sections headers and detailed information required by the Court's order,  
13 including the identification of anticipated deponents and disclosure of corporate  
14 affiliations.

15 7. **Person Responsible for Filing the Report.** As one of Plaintiff's  
16 counsel, I was responsible for filing the Joint Rule 26(f) Report through my  
17 administrative staff. I also coordinated with co-counsel and opposing counsel to  
18 ensure that the filing was made timely.

19 8. **Corrective Actions and Apology.** Following receipt of the Court's  
20 Order to Show Cause, Plaintiff's counsel met again with defense counsel to review  
21 and revise the report and schedule. The Parties have since agreed on a single,  
22 corrected set of proposed deadlines. We believe the revised filing now complies  
23 with all of the Court's requirements regarding format, content, and calendaring.

9. We sincerely apologize to the Court for the oversight and any resulting inconvenience. These errors were unintentional and due to the complexity of multiple revisions and miscommunication during the editing process. We take the Court's orders seriously and are committed to ensuring full and accurate compliance moving forward.

10. We respectfully request that the Court accept this declaration and the corrected filing as our response to the Order to Show Cause and that no sanctions be imposed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on June 18, 2025, in Escondido, California.

Respectfully Submitted,

/s/Carly Roman  
Carly Roman  
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**CERTIFICATE OF SERVICE**

I, Carly Roman, hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record via the ECF system.

DATED this 18th day of June, 2025.

By: /s/ Carly Roman  
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*Counsel for Plaintiff Buls*